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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 24, 2006

Mr. Gary Miller, Remedial Project Manager
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Gulfco Marine Maintenance Federal Superfund Site
Freeport, Brazoria County, TX
Final RI/FS Work Plan and Sampling and Analysis Plan

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2006 JUN -1 PM 6:23
AR/OK/TX BRANCH

Dear Mr. Miller:

The Texas Commission on Environmental Quality (TCEQ) has completed review of the Final RI/FS Work Plan for the above referenced site. The review of this document was completed by the TCEQ Environmental Cleanup Section II, Toxicology Section (Anthony M. Matthews), Technical Support Section (Larry Champagne) and the Natural Resource Trustees (National Oceanic and Atmospheric Agency, U.S. Fish and Wildlife Service and Texas General Land Office). Based on review of the document, all of our previous ecological concerns appear to have been addressed and no further responses need to be provided. However, with regard to the human health issues the Environmental Cleanup and Toxicology sections have one comment as presented below:

Section 5.6.3. Soil Investigation.

This section describes that surface soil sampling will extend to 5 ft below ground surface (bgs), whenever sampling from 0-2 ft bgs indicates the presence of contaminant concentrations exceeding the relevant Preliminary Screening Values (PSVs) (the PSV should be equal to or less than the TRRP protective concentration level (PCL) for total combined exposures to soil ($^{Tot}Soil_{Comb}$). However, no response was provided regarding the 0-15 ft bgs soil depth for residential soils. To be consistent with TRRP, the Human Health Risk Assessment should utilize soil data from 0-5 ft bgs on commercial/industrial (C/I) property and 0-15 ft bgs on residential property, or to the top of groundwater, whichever is less in depth.

If you have any questions please contact me at (512) 239-6368.

Sincerely,

A handwritten signature in black ink, appearing to read "Ludmila Voskov".

Ludmila Voskov, P.G., Project Manager
Team 3, Environmental Cleanup Section II
Remediation Division
Texas Commission on Environmental Quality

LV/ts



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